

United States District Court

FILED

NORTHERN

DISTRICT OF

CALIFORNIA

APR 20 2007

UNITED STATES OF AMERICA

Venue: SAN FRANCISCO

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

v.

ANGEL ESCOBAR  
a/k/a CARLOS ADAMES

CRIMINAL COMPLAINT

3-07 70236

CASE NUMBER:

EMC

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 20, 2002, in San Mateo County, in the Northern District of California, the defendant did, willfully and knowingly make a false statement in an application for a passport with intent to induce or secure the issuance of a passport under the authority of the United States, either for his own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws in violation of Title 18 United States Code, Section 1542, False Statement in a Passport Application.

I further state that I am a Special Agent and that this complaint is based on the following facts:

**See attached Affidavit in Support of Criminal Complaint**

Maximum Penalties:

Title 18 USC Section 1542:

10 years of imprisonment; \$250,000 fine; 3 years supervised release; and \$100 special assessment fee

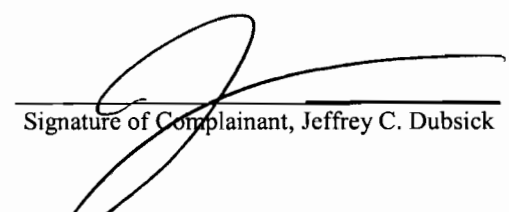
APPROVED AS TO FORM:

  
Derek Owens, SAUSA

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Warrant of Arrest Requested: ☒ Yes ☐ No

Bail Amount: \_\_\_\_\_

  
Signature of Complainant, Jeffrey C. Dubsick

Sworn to before me and subscribed in my presence,

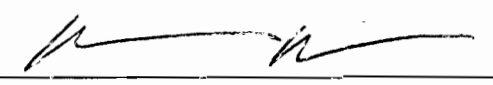
April 20, 2007  
Date

at San Francisco, California  
City and State

Nandor J. Vadas  
~~Edward M. Chen~~  
United States Magistrate Judge

United States Magistrate Judge

Name & Title of Judicial Officer

  
Signature of Judicial Officer



***Relevant Statute***

5. The Passport Act of 1926, as amended, was in full force and effect throughout the period of this investigation. This Act, codified in 22 U.S.C. § 211a, authorized the United States Secretary of State to grant and issue United States passports under rules prescribed by the President and/or other federal laws. Some of these rules are that a person wanting a United States passport must complete and submit an application to the State Department and must submit proof of American citizenship, usually a birth certificate, and proof of identity, usually a driver's license and Social Security Number, with their application. Another rule allows officers at United States Post Offices to accept passport applications, and to then forward them to the State Department for processing.

6. Title 18 U.S.C. § 1542 states, in pertinent part, "Whoever willfully and knowingly makes any false statement in an application for a passport with intent to induce or secure the issuance of a passport under the authority of the United States, either for their own use or the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws...shall be fined under this title...or imprisoned not more than 10 years...or both." Title 18 U.S.C. § 3291 provides for a ten year statute of limitations for passport offenses.

***Facts Supporting Probable Cause***

7. On or about May 20, 2002, a person purporting to be CARLOS ADAMES submitted an application for a United States passport at the Redwood City Post Office, which is located in the Northern District of California. A review of this application and other State Department records disclosed this person submitted a Puerto Rican birth certificate bearing the name of CARLOS ADAMES, and that he listed the following information, in sum:

Name: CARLOS ADAMES  
Place of Birth: Puerto Rico

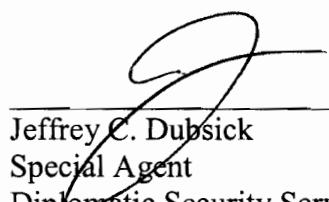
8. On April 11, 2007, Special Agent Bruce Palombo and I interviewed the person purporting to be CARLOS ADAMES. This person told us he was the passport applicant and that his true name was ANGEL ESCOBAR, not CARLOS ADAMES. He also told us he was born in Guerrero, Mexico, not Puerto Rico. He also told us he obtained the CARLOS ADAMES' Puerto Rican birth certificate for free from a friend.

***Conclusion***


10. Based on the facts and information detailed in the affidavit, I believe probable cause exists that ANGEL ESCOBAR, also known as CARLOS ADAMES, made a false statement in a passport application, in violation of 18 U.S.C. § 1542, when he falsely

stated his name was CARLOS ADAMES and his place of birth was Puerto Rico on the aforementioned passport application, which was submitted at the Redwood City Post Office in the Northern District of California. As such, I respectfully request a warrant for his arrest.

Under penalty of perjury, I swear that the foregoing is true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Jeffrey C. Dubsick  
Special Agent  
Diplomatic Security Service  
San Francisco Field Office

SUBSCRIBED AND SWORN BEFORE ME  
ON April 20, 2007

  
\_\_\_\_\_  
THE HONORABLE NANDOR J. VADAS  
United States Magistrate Judge  
Northern District of California